

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt)**

In re:

Clifford Cornelius Wong and Adebessi  
Charles Wong

Debtors

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Case No. 15-19543  
Chapter 13

\* \* \* \* \*

**RES-FL FOUR, LLC’S OBJECTION TO CONFIRMATION  
OF DEBTORS’ THIRD AMENDED CHAPTER 13 PLAN**

RES-FL FOUR, LLC (the “Noteholder”), by its undersigned counsel and pursuant to 11 U.S.C. § 1325, objects to the confirmation of Clifford Cornelius Wong and Adebessi Charles Wong’s (together, the “Debtors”) Third Amended Chapter 13 Plan [Dkt. 48] (the “4<sup>th</sup> Plan”) as follows:

1. The Noteholder is the largest unsecured creditor of the Debtors’ estate and previously filed an objection [Dkt. 45] (the “Initial Objection”) to the confirmation of the Debtor’s Second Amended Plan of Reorganization.

2. The 4<sup>th</sup> Plan suffers from the same infirmities as the Second Amended Plan.<sup>1</sup> Therefore the Noteholder incorporates by reference its Initial Objection as a continuing objection to the confirmation of the 4<sup>th</sup> Plan.

3. In addition, the Noteholder filed a Motion to Dismiss the Debtors’ Case with Prejudice [Dkt. 49] (the “Motion to Dismiss”) on August 9, 2016. By way of its Motion to Dismiss, the Noteholder argues that, *inter alia*, the Debtors’ bankruptcy case should be dismissed because the 4<sup>th</sup> Plan is not proposed in “good faith” as required by Section 1325(a)(3) of the Bankruptcy Code. The Noteholder incorporates by reference all of those arguments set forth in its Motion to Dismiss as objections to the confirmation of the 4<sup>th</sup> Plan.

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<sup>1</sup> And the plan before that, and the plan before that....

4. The Noteholder reserves its right to submit further objection to the confirmation of the 4<sup>th</sup> Plan

**WHEREFORE**, RES-FL FOUR, LLC respectfully requests that the Court enter an Order denying confirmation of the Debtors' Third Amended Chapter 13 Plan, dismissing this bankruptcy case with prejudice, and granting such further relief as is just and appropriate.

Respectfully submitted,

Dated: August 12, 2016

s/ Joshua D. Bradley  
Joshua D. Bradley (ID 28821)  
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*Attorneys for RES-FL FOUR, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, that on this 12<sup>th</sup> day of August 2016, a copy of the foregoing  
Objection to Confirmation of Debtors' Chapter 13 Plan, was served on the following persons, via  
ECF and/or first class U.S. mail, postage prepaid.

US Trustee  
US Trustee – Greenbelt  
6305 Ivy Lane, Suite 600  
Greenbelt, Maryland 20770

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/s/ Joshua D. Bradley  
Joshua D. Bradley

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